

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Fred Mogul,

Plaintiff,

v.

**NEW YORK PUBLIC RADIO; WNYC;
and AUDREY COOPER,**

Defendants.

**No. 21-cv-05882-CM
[rel. 1:21-cv-04972-CM-RWL]**

**DECLARATION OF WENDY BUTLER IN SUPPORT OF
DEFENDANT NEW YORK PUBLIC RADIO'S
OPPOSITION TO PLAINTIFF'S MOTION TO REMAND**

I, Wendy C. Butler, declare and state:

1. I am a partner of the law firm Jones Day, 250 Vesey Street, New York, New York, 20281, counsel for Defendants in the above-captioned matter. The facts set forth in this Declaration are of my own personal knowledge, and if called as a witness, I could and would testify competently to their truth.

2. Attached as **Exhibit 1** to this Declaration is a true and accurate copy of the collective-bargaining agreement between Defendant New York Public Radio and the Plaintiff Fred Mogul's union, Screen Actors Guild – American Federation of Television and Radio Artists, New York Local.

I declare, under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct.

Dated: August 16, 2021

/s/ Wendy Butler

Wendy Butler
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